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*Attorneys for Defendants
Social Finance, Inc. d/b/a SoFi and
SoFi Lending Corp. d/b/a SoFi*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

RUBEN JUAREZ, CALIN CONSTANTIN SEGARCEANU, EMILIANO GALICIA, and JOSUE JIMENEZ, on behalf of themselves and all others similarly situated,

Plaintiffs.

VS

SOCIAL FINANCE, INC. d/b/a SOFI, and
SOFI LENDING CORP. d/b/a SOFL

Defendants

Case No.: 4:20-cv-03386-HSG

JOINT STIPULATION AND ORDER TO FURTHER STAY LITIGATION

District Judge: Haywood S. Gilliam, Jr.

Complaint filed: May 19, 2020

First Amended Complaint Filed: July 30, 2020

Second Amended Complaint Filed: May 3, 2021

Pursuant to Civil Local Rules 6-1(b) and 6-2, Plaintiffs Ruben Juarez, Calin Constantin Segarceanu, Emiliano Galicia, and Josue Jimenez (“Plaintiffs”), through counsel, along with counsel for Defendants Social Finance, Inc. d/b/a SoFi and SoFi Lending Corp. d/b/a SoFi

1 (collectively, "SoFi," and together with Plaintiffs, the "Parties"), respectfully submit the following
 2 Joint Stipulation and Proposed Order to Further Stay Litigation.

3 **RECITALS**

4 WHEREAS, on May 19, 2020, Plaintiff Juarez filed a putative class action Complaint
 5 against SoFi in the above-captioned matter, asserting violations of the Civil Rights Act of 1866, 42
 6 U.S.C. § 1981, and the California Unruh Civil Rights Act, Cal. Civil Code §§ 51, *et seq.*, (D.E. 1);

7 WHEREAS, on July 30, 2020, Plaintiffs Juarez and Segarceanu filed a First Amended
 8 Complaint, adding named Plaintiff Segarceanu and claims under the Fair Credit Reporting Act, 15
 9 U.S.C. § 1681, *et seq.* (D.E. 33);

10 WHEREAS, on May 3, 2021, Plaintiffs filed a Second Amended Complaint (as authorized
 11 by the Court), incorporating additional named Plaintiffs Jimenez and Galicia (D.E. 56, 62);

12 WHEREAS, following the May 4, 2021 case management conference, the Court entered a
 13 Scheduling Order on May 12, 2021, pursuant to which fact discovery closes April 3, 2022 (D.E.
 14 66);

15 WHEREAS, on July 15, 2021, the Parties participated in a private mediation session with
 16 JAMS arbitrator David Geronemus, Esq., during which they were ultimately unable to reach a
 17 settlement;

18 WHEREAS, on November 3, 2021, the Court approved the Parties' Joint Stipulation seeking
 19 to stay the case through December 28, 2021 in order to focus on continued settlement discussions,
 20 but cautioned the Parties that if the case is not settled by December 28, 2021, they should be prepared
 21 to proceed under the current case schedule (D.E. 84);

22 WHEREAS, on December 28, 2021, the Parties provided an update to the Court that
 23 substantial process was made towards settlement (D.E. 85), and on January 3, 2022 the Court
 24 approved the Parties' Joint Stipulation seeking to further stay the case through January 27, 2022
 25 (D.E. 86);

26 WHEREAS, on January 27, 2022, the Parties filed a Joint Stipulation updating the Court
 27 that they had reached an agreement to settle the case in principle, and seeking to extend the stay of

1 discovery through March 28, 2022, by which date the Parties agreed that Plaintiffs would file a
2 motion for preliminary approval or the Parties would otherwise jointly update the Court as to the
3 status of their settlement efforts (D.E. 87);

4 WHEREAS, on January 28, 2022 the Court approved the Parties' Joint Stipulation seeking
5 to further stay the case through March 28, 2022 (D.E. 88);

6 WHEREAS, since that time, the Parties have documented the written agreement and are
7 finalizing execution of the agreement and completion of draft notices;

8 WHEREAS, the Plaintiffs expect to file for preliminary approval within 14 days;

9 WHEREAS, a continued stay will further conserve judicial resources and allow the Parties
10 to continue efforts towards documenting settlement; and

11 WHEREAS, the Parties affirm that no party will be prejudiced by this stipulation, nor will
12 the requested extension unduly delay the case;

13 **STIPULATION**

14 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs
15 and SoFi through their respective undersigned counsel that:

- 16 1. All formal discovery, discovery obligations and motion practice shall be suspended
17 and stayed for another 14 days, (until April 11, 2022) to enable the Parties to conserve
18 resources and focus their efforts on settlement;
- 19 2. Plaintiffs will file for preliminary approval on or before April 11, 2022, or the parties
20 will submit an update to the Court in which they will apprise the Court of the
21 expected timing for the filing of a motion for preliminary approval;
- 22 3. This stipulation is without prejudice to the rights, claims, arguments, and defenses of
23 all Parties; and
- 24 4. All other signatories listed, and on whose behalf the filing is submitted, concur with
25 the content in this Stipulation and have authorized the filing.

26 IT IS SO STIPULATED.

1 OUTTEN & GOLDEN LLP
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3 Dated: March 25, 2021
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5 By: /s/ Ossai Miazad
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65 Social Finance, Inc. d/b/a SoFi and
66 SoFi Lending Corp. d/b/a SoFi*
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1 **ORDER**
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3 **PURSUANT TO STIPULATION, IT IS SO ORDERED,**
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5 DATED: 3/25/2022

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7 
8 Haywood S. Gilliam, Jr
9 United States District Judge

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